

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Raven Madison

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Experian Information Solutions, Inc
Trans Union LLC
Equifax, Inc

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 2:23-cv-29-BHH-MHC

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

FILED
CLERK, CHARLESTON, SC
2023 JUN -4 AM 10:33

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Raven Gadsom</u>
Street Address	<u>4781 Lamb's Rd</u>
City and County	<u>North Charleston, Charleston county</u>
State and Zip Code	<u>South Carolina, 29418</u>
Telephone Number	<u>843 530 8259</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Experian Information Solutions Inc</u>
Job or Title (if known)	<u>Credit Reporting Agency</u>
Street Address	<u>475 Anton Blvd</u>
City and County	<u>Costa Mesa, Orange County</u>
State and Zip Code	<u>California 92626</u>
Telephone Number	<u>1 714 830 7000</u>

Defendant No. 2

Name	<u>TransUnion LLC</u>
Job or Title (if known)	<u>Credit Reporting Agency</u>
Street Address	<u>1510 Chester Pike 2 Baldwin place</u>
City and County	<u>Crum Lynne, Delaware County</u>
State and Zip Code	<u>PA 19022</u>
Telephone Number	<u>800 914 8800</u>

Defendant No. 3

Name	<u>Equifax inc</u>
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Job or Title credit reporting agency
(if known)
Street Address 1550 Peachtree Street, NW
City and County Atlanta, Gwinnett county
State and Zip Code Georgia 30309
Telephone Number 404 885 8910

Defendant No. 4

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 USC 1681i, 15 USC 1681e(b)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

15 USC 1681i

- 1) Plaintiff Initiated a dispute with Experian, Equifax, and Transunion for completeness and accuracy on 12/5/2022 For items damaging to them on their credit file.
- 2) Experian, Transunion, Equifax after failure of a reasonable investigation or no investigation verified these items as accurate. continued...

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff is seeking \$6,000, \$2,000 from each defendant for actual damages under the FCRA. \$31,000 in punitive damages as I have not been able to apply for Federal loans to cover my remaining college tuition due to the violations. Plaintiff asks for equitable relief. Finally, \$15,000 for emotional distress and defamation of character.

3) As a result of Experian, Transunion, Equifax's willful and/or negligent refusal to conduct a reasonable investigation has caused plaintiff harm.

15 USC 1681e(b)

4) Were Experian, Transunion, Equifax to follow procedures to assure maximum possible accuracy of plaintiffs reports it prepares; they would have removed inaccurate information reported on the plaintiffs credit report.

5) As a direct result of credit report prepared by each Credit reporting agency their willful and/or negligent failure to follow procedures to assure maximum possible accuracy of the information they report, Plaintiff has been harmed namely being denied 3 credit cards.

V. Certification and Closing


Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/2, 2023.

Signature of Plaintiff



Printed Name of Plaintiff

Raven Gladson

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address